

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

THE CITY OF DETROIT’S RESPONSE TO DANNY CROWELL, LEOTA MURPHY AND JASMINE CROWELL’S MOTION FOR RELIEF FROM THE ORDER DATED AUGUST 2, 2016 UNDER BANKRUPTCY RULE 9024 AND 3008

The City of Detroit files this response to Danny Crowell, Leota Murphy and Jasmine Crowell’s (“Movants”) Motion for Relief from the Order Dated August 2, 2016 Under Bankruptcy Rule 9024 and 3008 [Doc. No. 11426] (“Motion”).¹ In support of this Response, the City states as follows:

1. On July 12, 2016, the City of Detroit filed its Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Danny Crowell, Leota Murphy and Jasmine Crowell [Doc. No. 11357] (“Motion to Enforce”).

2. On July 27, 2016, this Court entered an Order to Allow Paper Filings of Danny Crowell, Leota Murphy and Jasmine Crowell’s Response Opposing the

¹ The Motion is set for hearing on September 28, 2016, at 1:30 p.m. [Doc. No. 11495].

City of Detroit's Motion to Enforce Order ("Order"). The Order provided in pertinent part that "These parties must file their papers separately from their ex parte motion. And such paper must contain an actual original signature by the parties' attorney." Order, p. 1.

3. No response to the Motion to Enforce was filed on the Court's docket by the deadline of July 29, 2016. Consequently, on August 2, 2016, the City filed its certificate of no response. [Doc. No. 11414]. Later on August 2, 2016, this Court entered an order granting the Motion to Enforce. [Doc. No. 11417].

4. On August 9, 2016, the Movants filed the Motion. Attached to the Motion as Exhibit B is a response to the Motion to Enforce. The response contains a stamp from the Clerk of the Court dated July 28, 2016. Exhibit B at 1. To the extent Exhibit B was filed with the Court on July 28, 2016,² the City does not object to the Motion's request that the Court decide the Motion to Enforce on the merits.

² Exhibit B does not appear on the Court's docket other than as an attachment to the Motion.

Dated: August 29, 2016

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

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**CERTIFICATE OF SERVICE OF THE CITY OF DETROIT'S RESPONSE
TO DANNY CROWELL, LEOTA MURPHY AND JASMINE CROWELL'S
MOTION FOR RELIEF FROM THE ORDER DATED AUGUST 2, 2016
UNDER BANKRUPTCY RULE 9024 AND 3008**

The undersigned hereby certifies that on August 29, 2016, he caused a copy
of *THE CITY OF DETROIT'S RESPONSE TO DANNY CROWELL, LEOTA
MURPHY AND JASMINE CROWELL'S MOTION FOR RELIEF FROM THE
ORDER DATED AUGUST 2, 2016 UNDER BANKRUPTCY RULE 9024 AND
3008* to be served upon counsel for the Movants via first class mail and email as
listed below:

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Dated: August 29, 2016